March 24, 2017

Ms. Carol Sutkus, Manager South Coast Air Quality Planning Air Resources Board 1001 I Street P.O. Box 2815 Sacramento, CA 95812

SIP Submittal: Rule 1110.2 - Emissions from Gaseous- and Liquid-Fueled Engines

Dear Ms. Sutkus:

Attached you will find information pertaining to Rule 1110.2 which was amended by the South Coast Air Quality Management District Governing Board on July 9, 2010, September 7, 2012, December 4, 2015 and June 3, 2016.

July 9, 2010 Amendment

This amendment to Rule 1110.2 added an exemption for internal combustion engines operated at one remote public safety communication facility in southwestern Riverside County on Santa Rosa Peak at over 7,400 foot altitude that does not have access to electric power or natural gas. The facility includes a communications tower and support equipment operated by Riverside County and used by fire, police and other public safety agencies. The site has limited access during winter. This exemption allows the use of diesel generators at the site.

It should be noted that a SIP submittal was made in May 2, 2014 for this amendment but there was no action taken by the U.S. EPA.

September 7, 2012 Amendment

Consistent with staff's August 2012 Final Technology Assessment findings, this amendment reestablished the previously adopted emission limits (11 ppm NOx; 30 ppm VOC; and 250 ppm CO) for biogas-powered internal combustion engines. The amendment provided additional time for compliance until January 1, 2016; a compliance option for a longer averaging time for engines with superior performance in achieving lower mass emissions; and a compliance option that further extended the effective date (up to January 1, 2018) for certain engines with the payment of a compliance flexibility fee.

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December 4, 2015 Amendment

This amendment extended the compliance date to January 1, 2017 for all biogas engines, provided a compliance option for additional time with the payment of a compliance flexibility fee (up to January 1, 2019), and addressed U.S. EPA's concerns on equipment breakdowns and potential excess emissions without enforcement by establishing a limit for exceedances due to breakdowns without enforcement action per calendar quarter.

June 3, 2016 Amendment

The December 4, 2015 amendment provided the regulated community with additional time to comply with the biogas engine limits. Staff was directed to return to the Board with an amendment that would provide relief for one affected facility as expeditiously as possible with the proper CEQA analysis. This single facility operates two landfill gas-fired engines at the Prima Deshecha Landfill, is subject to a power purchase agreement (PPA) that expires on October 1, 2022, and cannot economically meet the established compliance deadline of January 1, 2017. This amendment exempted the facility operator from the emission requirements of the rule, contingent on the facility submitting a retirement plan for the permanent shutdown of all equipment subject to this rule at the expiration date of the PPA.

We are requesting that upon your review and concurrence the attached information be provided to U.S. EPA for its review and inclusion in the SIP.

If you have any questions on this submittal, please contact Tracy Goss, Planning and Rules Manager, at (909) 396-3106 or tgoss@aqmd.gov.

Sincerely,

Philip M. Fine, Ph.D. Deputy Executive Officer

Planning, Rule Development & Area Sources

PMF:SN:TG:GQ:KO

Attachments:

SIP Completeness Checklist
APCD/AQMD Rule Evaluation Form
Clean Copy of Amended Rules
Strikeout Copy of Amended Rules
Proof of Publications
Signed Board Resolutions
Signed Board Minutes
Staff Reports (Includes Public Comments & Responses)
Additional Materials

cc: Andrew Steckel/U.S. EPA Region IX (w/o attachments)
Mary Leonard/SCAQMD (w/o attachments)
Philip Fine/SCAQMD (w/o attachments)
Susan Nakamura/SCAQMD (w/o attachments)
Tracy Goss/SCAQMD (w/o attachments)
Regulation XX (w/o attachments)
SIP File (w/attachments)